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Approved:

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Danielle M. Kudla
Assistant United States Attorney

Before: THE HONORABLE GABRIEL W. GORENSTEIN
Chief United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
- v. -	:	Violations of 18 U.S.C.
	:	§ 2113(a)
CONOR GANNON,	:	COUNTY OF OFFENSE:
Defendant.	:	NEW YORK

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SOUTHERN DISTRICT OF NEW YORK, ss.:

SARAH JOYCE, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Bank Robbery)

1. On or about August 20, 2019 in the Southern District of New York and elsewhere, CONOR GANNON, the defendant, by force and violence, and by intimidation, knowingly, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, to wit, GANNON attempted to obtain \$5000.00 from a bank located in the vicinity of 127 8th Avenue in Manhattan, New York by threatening a bank employee.

(Title 18, United States Code, Section 2113(a).)

The bases for my knowledge and for the foregoing charges, are, in part, as follows:

2. I am a Special Agent with the FBI, and a member of the FBI/New York City Police Department ("NYPD") Violent Crime Task Force (the "Task Force"), and I have been personally involved in

the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers, my examination of reports and records prepared by law enforcement officers and others, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Robbery

3. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned, in substance and in part, the following:

a. At approximately 1:15 p.m., on or about August 20, 2019, a man who has since been identified as CONOR GANNON, the defendant, see infra ¶ 4, entered a Bank of America branch located at 127 8th Avenue in Manhattan, New York (the "Bank"). When GANNON entered the Bank, he was wearing a pink baseball hat, green t-shirt, tan cargo pants, brown work boots, and eyeglasses, and had a mustache.

b. GANNON approached a bank teller (the "Teller") carrying a large paper bag. GANNON placed the bag on the counter and stated in sum and substance "I have a bomb. If you don't give me \$5,000, I have a phone in my pocket and when I get outside I'm gonna make the bomb go off." The Teller did not comply and walked away from the window. GANNON then fled the Bank on foot leaving the large paper bag behind.

GANNON Is Identified

4. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned, in substance and in part, the following:

a. At approximately 2:15 p.m., on or about August 20, 2019, CONOR GANNON, the defendant, entered the Thirteenth New York Police Department ("NYPD") Precinct Station House located at 230 East 21st in Manhattan, New York. GANNON identified himself as "John Felix" and stated to the desk sergeant in sum and substance that he had robbed a bank and was there to turn himself in.

b. At approximately 2:30 p.m., FBI agents responded to a report of robbery at the Bank. Upon arriving at the Bank, the agents spoke with the Teller and a bank manager, who each stated in sum and substance that the man who attempted to rob the bank appeared to be a white male with a mustache, wearing eyeglasses, a baseball hat, and a green t-shirt, and carrying a large paper bag. An inspection of the large paper bag left by GANNON revealed that it contained what appears to be clothing.

c. At approximately 3:15 p.m., on or about August 20, 2019, FBI agents arrived to the Thirteenth Precinct NYPD Station House and arrested GANNON, who was wearing the same clothes described by the Teller and bank manager and shown on surveillance photographs taken from the Bank.

d. Based on my comparison of the August 20, 2019 surveillance photographs from the Bank and GANNON's physical appearance shortly after the attempted bank robbery, I believe that GANNON is the man who robbed the Bank on August 20, 2019.

e. Following his arrest, FBI agents fingerprinted CONOR GANNON, the defendant. The results of the fingerprint analysis indicated that his name is "Conor Gannon."

Federal Deposit Insurance Corporation

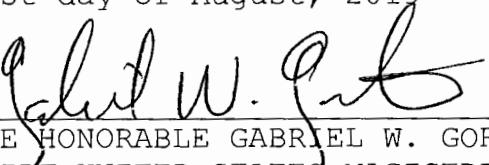
5. From my review of publicly available materials, as well as my training and experience as a Special Agent of the FBI and a member of the Task Force, I know that, at all relevant times, the deposits of the Bank were insured by the Federal Deposit Insurance Corporation.

WHEREFORE, the deponent respectfully requests that CONOR GANNON, the defendant, be imprisoned or bailed, as the case may be.



SARAH JOYCE
Special Agent
Federal Bureau of Investigation

Sworn to before me this
21st day of August, 2019



THE HONORABLE GABRIEL W. GORENSTEIN
CHIEF UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK